

## **Remarks**

Upon entry of the foregoing Amendment, claims 1-10 are pending in the present application. Claims 11-29 and 31-45 have been cancelled without prejudice or disclaimer. In view of the foregoing Amendment and following Remarks, allowance of all the pending claims is respectfully requested.

### **Information Disclosure Statement**

Applicants thank the Examiner for considering the references submitted in the Information Disclosure Statement filed February 7, 2005, as evidenced by the signed and initialed Form PTO-1449.

### **Rejections Under 35 U.S.C. § 112, First Paragraph**

The Examiner has rejected claims 1-10 under 35 U.S.C. § 112, first paragraph, as allegedly failing to comply with the enablement requirement. Applicants traverse this rejection because a person having ordinary skill in the art would be able to make and use the claimed invention based on the written description.

The Examiner alleges that the features "wherein said turnstile identifies one or more network elements in a communication path between said turnstile and said director" and "wherein said director logically connects said turnstile with a particular one of said plurality of participant managers based on said one or more network elements" are not described in the specification. Applicants disagree.

Regarding the feature of "wherein said turnstile identifies one or more network elements in a communication path between said turnstile and said director," the Examiner has acknowledged that the written description describes the process by which a "turnstile locat[es a] corresponding participant manager" at page 38, lines 6-13. See Non-Final Action at 3. For at least the reasons acknowledged by the Examiner, and the detailed description of the process by which turnstiles identify various network elements (See, e.g., Specification at pg. 31, line 7 – pg. 36, line 2; and pg. 37, line 15 – pg. 39, line 16), the feature of "wherein said turnstile identifies

one or more network elements in a communication path between said turnstile and said director" is sufficiently described.

Regarding the feature of "wherein said director logically connects said turnstile with a particular one of said plurality of participant managers based on said one or more network elements," the Examiner appears to have overlooked the portion of the specification that describes the process by which the director connects participants with participant managers at, for example, pg. 41, line 9 – pg. 44, line 14, and the corresponding description of the relationship between participants and turnstiles at, for example, pg. 26, line 17 – pg. 27, line 14.

Because the specification sufficiently describes the invention so as to enable a person having ordinary skill in the art to make and use the invention, the rejections under 35 U.S.C. § 112, first paragraph are improper and must be withdrawn.

**Rejections Under 35 U.S.C. § 102**

**1. Clark et al. (International Publication No. WO 01/22725) does not anticipate claim 1.**

The Examiner has rejected claims 1, 4, and 5 under 35 U.S.C. § 102(a) as allegedly being anticipated by Clark et al. (International Publication No. WO 01/22725) ("Clark"). Applicants traverse this rejection because Clark does not disclose each and every feature of the claimed invention.

Clark fails to teach at least the claimed features of "a director," "a plurality of participant managers. . .logically connected. . .to said director thereby forming a hierarchy," and "a turnstile. . .associated with each of the plurality of participants, each turnstile logically connected to one of said plurality of participant managers in said hierarchy." The Examiner has incorrectly interpreted Clark for at least the reason that the architecture of Clark is incapable of being arranged as set forth by the claimed invention.

Claim 1 sets forth a hierarchical relationship between components, where a director is logically connected to a plurality of participant managers, and where the participant managers are logically connected to turnstiles associated with participants. Claim 1 also provides that the director logically connects turnstiles with a particular participant manager based on one or more identified network elements

in a communication path between the turnstile and the director. That is, claim 1 sets forth a hierarchical relationship where participant managers lie "between said turnstile and said director."

The Examiner equates the interface server, mapping server, and set top box of Clark to the claimed "director," "participant manager," and "turnstile," respectively. However, following the Examiner's reasoning on page 4 of the Office Action that a "set top box...logically connects to mapping server via [interface server]," the director would have to lie between the turnstile and the participant managers. This architectural arrangement is distinct from the architecture set forth by claim 1 and the Examiner's interpretation of claim 1 is therefore incorrect, for at least the reason that Clark discloses components that are arranged in a manner different from that set forth in the claims.

For at least the reasons provided above, the rejection of claim 1 as being anticipated by Clark is improper and must be withdrawn. Claims 4 and 5 depend from and add features to claim 1. Thus, the rejections of these claims as being anticipated by Clark are likewise improper and must be withdrawn for at least the same reasons.

**2. Savage, III, et al. (US 2001/0009014) does not anticipate claim 1.**

The Examiner has rejected claims 1-5 and 8-10 under 35 U.S.C. § 102(e) as allegedly being anticipated by Savage, III, et al. (US 2001/0009014) ("Savage"). Applicants traverse this rejection because Savage does not disclose each and every feature of the claimed invention.

Savage fails to teach at least the claimed features of "a director...for delivering the event to the plurality of participants" and "a plurality of participant managers." The Examiner alleges that the dispatch server of Savage teaches the claimed "director" at paragraphs 0048-0051. However, the cited passages of Savage clearly reflect that the dispatch server does not "deliver [an] event to [a] plurality of participants," but rather connects a participant to a media server that delivers the event to the participant (paragraph 0051, "Upon receiving the join request from the client to join conference XYZ and validating the origin of the request, dispatch server...dispatches client 108 to the IP address of the server 104 on which conference XYZ is currently being facilitated.")).

Similarly, the Examiner alleges that the media servers of Savage teach the

claimed feature of "participant managers." Applicants disagree with this assessment for at least the reason that the media servers do not manage participation in events. Instead, the dispatch server and authentication server collectively control the process by which a participant joins an event. See Savage at paragraphs 0048-0051.

Additionally, the Examiner's misinterpretation of the claims discussed above in relation to the application of the Clark reference carries over to the rejections relying upon Savage. Savage does not teach the claimed relationship between "a director," "a plurality of participant managers," and "a turnstile...associated with each of the plurality of participants" because there is no "director" or "participant manager" through which the event is delivered to participants, as set forth by claim 1. Instead, a participant is authorized for an event by calling a dispatch server, which directly connects the participant to an event server. This type of architecture fails to include the additional components of a "director" and "a plurality of participant managers," and suffers the same drawbacks as identified in the Background section of the present application. See Specification at 1-3.

For at least the reasons provided above, the rejection of claim 1 as being anticipated by Savage is improper and must be withdrawn. Claims 2-5 and 8-10 depend from and add features to claim 1. Thus, the rejections of these claims as being anticipated by Savage are likewise improper and must be withdrawn for at least the same reasons.

## ***Conclusion***

Having addressed each of the foregoing rejections, it is respectfully submitted that a full and complete response has been made to the outstanding Office Action and, as such, the application is in condition for allowance. Notice to that effect is respectfully requested.

If the Examiner believes, for any reason, that personal communication will expedite prosecution of this application, the Examiner is invited to telephone the undersigned at the number provided.

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Respectfully submitted,

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